IN THE UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA NORFOLK DIVISION

In the Matter of: Patricia Bunyan-Scott Debtor

Case No. 18-71702-FJS Chapter 13

MOTION TO SUSPEND PLAN PAYMENTS

NOW COME the debtor, by Counsel, and state the following, to wit:

- 1. That the Debtor filed a Chapter 13 bankruptcy on May 14, 2018.
- 2. That the Debtor filed her Amended Chapter 13 Plan on August 21, 2018 which was confirmed on February 4, 2019.
- 3. That R. Clinton Stackhouse, Jr. was appointed and serves as the Trustee in this case.
- 4. Debtor is requesting a suspension for the months of March 2019 and April 2019 due to a reduction in her husband's income. The husband is currently seeking other employment and expects to have obtained another job by May 2019.
- 5. That Debtor will resume her Chapter 13 plan payments in May 2019.
- 6. That the Debtors must cure the arrears from the two (2) month suspension by fifty-fifth (55) months of her Chapter 13 Plan.

WHEREFORE, the debtor prays this Honorable Court enter an Order allowing Debtor to suspend her Chapter 13 plan payments for the months of March 2019 and April 2019, with payments resuming in May 2019 and that the Debtor will cure the arrearages by the fifty-fifth (55) months of her Chapter 13 Plan.

Patricia Bunyan-Scott

/s/ Kenneth E. Goolsby

Kenneth E. Goolsby, Esquire

Kenneth E. Goolsby, Esq. The Alliance Legal Group Attorney for the debtor(s) 133 Mount Pleasant Road Chesapeake, Virginia 23322 (757) 482-5705 VSB#: 86347 Case 18-71702-FJS Doc 44 Filed 03/22/19 Entered 03/22/19 14:53:23 Desc Main Document Page 2 of 10

Counsel for the debtor

Certificate of Mailing

I hereby certify that on this day of March, 2019, the foregoing Motion was mailed to the debtor, all creditors, the Office of the United States Trustee, and the Chapter 13 trustee.

/s/ Kenneth E. Goolsby Kenneth E. Goolsby

IN THE UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA NORFOLK DIVISION

In the Matter of:

Patricia Bunyan-Scott Debtor

Case No. 18-71702-FJS Chapter 13

NOTICE OF MOTION TO SUSPEND PLAN PAYMENTS

The debtor has filed papers with the Court to Suspend Plan Payments.

Your rights may be affected. You should read these papers carefully and discuss them with your Attorney, if you have one in this case. (If you do not have an Attorney, you may wish to consult one.)

If you do not want the Court to grant the Motion requested, or if you want the Court to consider your views on the Motion, then on or before 41219, you or your Attorney must file with the Court, at the address shown below, a written response pursuant to Local Bankruptcy Rule 9013-1(H).

Clerk of the Court United States Bankruptcy Court 600 Granby Street, Fourth Floor Norfolk, VA 23510

You must also send a copy of your written response to:

Kenneth E. Goolsby, Esquire Counsel for the Debtor The Alliance Legal Group 133 Mount Pleasant Road Chesapeake, VA 23322

If you or your Attorney do not take this step, the Court may decide you do not oppose the relief sought in the motion and may enter an Order granting the Motion without further notice or hearing.

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Date: March <u>22</u>, 2019

/s/ Kenneth E. Goolsby Kenneth E. Goolsby Counsel for the Debtøf

CERTIFICATE OF SERVICE

I hereby certify that a true copy of this Notice of Motion was mailed by First Class United States mail, postage prepaid, to the Office of the United States Trustee; the Chapter 13 Trustee; and all creditors and parties in interest, on this 20 day of March, 2019.

/s/ Kenneth E. Goolsby Kenneth E. Goolsby, Esquire

Kenneth E. Goolsby, Esq. The Alliance Legal Group Attorney for the debtor(s) 133 Mount Pleasant Road Chesapeake, Virginia 23322 (757) 482-5705 VSB#: 86347 Steven Legum 500 E. Main Street Suite 1107 Virginia Beach, VA 23452

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Anthony Scott 1104 Jackson Avenue Chesapeake, VA 23324

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Ashley Funding c/o Resurgent Capital Services POB10587 Greenville, SC 29603-0587

Ashley Funding Svcs. Lab Corp POB 10587 Greenville, SC 29603-0587

Barbara O Carraway, Treas. City of Chesapeake POB 16495 Chesapeake, VA 23328-6495

Barbara O. Carraway, Treasurer City of Chesapeake POB 16495 Chesapeake, VA 23328-6495

Bayview Phys. Group POB 7068 Portsmouth, VA 23707-0068

Carla Johnson c/o Goldblatt, Cohen, & Legum 500 E. Main St, Suite 1107 Norfolk, VA 23510 Chase Receivables for Ches Anesthesiologists, In POB 659 Caldwell, NJ 07007-0659

Chesapeake Anesthesiologist POB 791349 Baltimore, MD 21279-1349

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Commonwealth of Virginia Dept. of Taxation PO Box 2156 Richmond, VA 23261-7407

Cox Cable P.O. Box 509124 San Diego, CA 92150

Credit Collection Svcs. 725 Canton St. Norwood, MA 02062

Credit Control Corp P.O. Box 120568 Newport News, VA 23612

Credit One Bank POB 98873 Las Vegas, NV 89193-8873 Dominion Virginia Power P.O. Box 26666 Richmond, VA 23261-6666

EOS CCA P.O. Box 981002 Boston, MA 02298-1002

Fed Loan Servicing POB 69184 Harrisburg, PA 17106

Furniture Mart 5900 E Virginia Beach Blvd. #50 Norfolk, VA 23502

Glasser and Glasser PLC POB 3400 Norfolk, VA 23514

Grand Furniture Attn: Bankruptcy Dept. 1305 Baker Rd. Virginia Beach, VA 23455

Grand Furniture (notice) Craig L. Stein, Reg. Ag. 1305 Baker Rd. Virginia Beach, VA 23455

Hampton Roads Pathology 736 N. Battlefield Blvd. Chesapeake, VA 23320

HRUBS PO Box 5912 Virginia Beach, VA 23471-0912

Internal Revenue Svc. PO Box 7346 Philadelphia, PA 19101-7346

LCA Collections P.O. Box 2240 Burlington, NC 27216-2240

Midland Funding POB 2011 Warren, MI 48090-2011

North Shore Agency 270 Spagnoli Road, Ste. 110 Melville, NY 11747

NPRTO South-East, LLC 256 W. Data Drive Draper, UT 84020-2315

Ocwen Loan Servicing P.O. Box 24646 West Palm Beach, FL 33416-4646

Ocwen Loan Servicing, LLC Attn: Bankruptcy Dept. POB 24605 West Palm Beach, FL 33416-4605

Patient First POB 73810 Richmond, VA 23235-8047

Pediatric Specialist 885 Kempsville Road Suite 200 Norfolk, VA 23502

Professional Account Mgmt. P.O. Box 3032 Milwaukee, WI 53201

Progressive Insurance PO Box 85509 Richmond, VA 23285

Progressive Leasing 256 W. Data Drive Draper, UT 84020

Progressive Leasing for Furniture Mart 10619 So. Jordan Gateway, #100 South Jordan, UT 84095

Quantum3 Group for Ace Cash Express POB 788 Kirkland, WA 98083-0788

Receivables Management PO Box 8630 Richmond, VA 23226

Riverside Health Systems POB 826612 Philadelphia, PA 19182

Shapiro & Brown 501 Indepedence Pkwy, Ste. 203 Chesapeake, VA 23320-5174

SNJB-Customer Svc. 2705 W Sam Houston Pky N. Houston, TX 77043-1609

Sprint 6200 Sprint Parkway Overland Park, KS 66251

Sprint Nextel Attn: Bankruptcy Dept. PO Box 7949 Overland Park, KS 66207-0949

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